

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Plaintiffs,

-against-

Defendants.

I, Dina Gielchinsky, declare as follows:

2. Attached hereto as **Exhibit A** is a true and correct copy of a letter dated November 8, 2021, from Plaintiffs' counsel to counsel for Defendants MEAB Bank s.a.l., Fenicia Bank SAL, and Lebanon and Gulf Bank S.A.L. (coordinating on behalf of the Moving Defendants).

4. Attached hereto as **Exhibit C** is a true and correct copy of a letter dated November 29, 2021, from Plaintiffs' counsel to counsel for Defendants MEAB Bank s.a.l., Fenicia Bank SAL, and Lebanon and Gulf Bank S.A.L. (coordinating on behalf of the Moving Defendants).

5. Attached hereto as **Exhibit D** is a transcription of a document that appeared as part of a televised investigative report detailing the circumstances of the murder of Antoine Dagher, a former senior compliance officer for Defendant Byblos Bank. The segment aired on Lebanese television on June 4, 2022, and is available at the following URL: <https://twitter.com/LBCILebanon/status/1533175200568811521>. The document purports to be from Byblos Bank's compliance files.

6. Attached hereto as **Exhibit E** is a true and correct copy of a cash withdrawal slip issued by Byblos Bank for Abbas Ghorayeb, published as one of the documents disclosed by the Spider Z hack.

7. Attached hereto as **Exhibit F** are true and correct copies and certified translations of public statements reportedly issued by Defendants SGBL and Byblos Bank to the Lebanese media subsequent to the Spider Z hack denying they had accounts "in the name of Al-Qard Al-Hasan Organization."

8. Attached hereto as **Exhibit G** is a chart adopted from Exhibit 15 to the Declaration of Mark G. Hanchet in support of the Moving Defendants' Joint Motion for Protective Order reflecting "a list of the individuals and entities that plaintiffs allege to have been customers of the Moving Defendants," ECF No. 277-15, and adding in red text newly-discovered accountholders revealed by the limited third-party discovery production Plaintiffs have received.

9. Attached hereto as **Exhibit H** are the Responses and Objections of Defendant Lebanon and Gulf Bank SAL to Plaintiffs' First Set of Requests for Production, dated March 18, 2022.

10. Attached hereto as **Exhibit I** are Plaintiffs' First Set of Interrogatories Directed to Defendants, dated June 9, 2022.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on July 14, 2022

/s/ Dina Gielchinsky